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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. 4:25-mj-70874-MAG-1
)	
Plaintiff,)	STIPULATION TO CONTINUE STATUS
)	CONFERENCE AND EXCLUDE TIME FROM
v.)	AUGUST 8, 2025 TO AUGUST 26, 2025 AND
)	ORDER
JAMIE NUNEZ HERNANDEZ,)	
)	
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant, Jamie Nunez Hernandez, that time be excluded under the Speedy Trial Act and under Fed. R. Crim. P. Rule 5.1 from August 8, 2025 through August 26, 2025.

The parties recently entered into a protective order and initial discovery has been produced. Defense counsel needs time to review the discovery as well as to meet with the defendant, who is in custody in Martinez, California. Additionally, the parties are discussing a potential plea resolution, including the possibility of a potential pre-indictment resolution. The parties need additional time to discuss and negotiate a resolution. The parties will be better prepared to update the Court as to the status of the case on August 26, 2025.

The government and counsel for the defendant agree that time be excluded under the Speedy STIPULATION TO CONTINUE, EXCLUDE TIME AND ORDER
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1 Trial Act so that defense counsel can continue to prepare, including by reviewing the discovery already
2 produced. For this reason and as further stated above, the parties stipulate and agree that continuing the
3 status conference and excluding time until August 26, 2025, will allow for the effective preparation of
4 counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of
5 justice served by excluding the time from August 8, 2025 through August 26, 2025 from computation
6 under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.
7 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

8 Additionally, based on the facts set forth above, and with the consent of the defendant, and
9 taking into account the public interest in the prompt disposition of criminal cases, the parties agree that
10 good cause exists for extending the time limits for a preliminary hearing under Federal Rule of Criminal
11 Procedure 5.1 and for extending the 30-day time period for an indictment under the Speedy Trial Act
12 (based on the exclusions set forth above). *See* Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

13 The undersigned Assistant United States Attorney certifies that she has obtained approval from
14 counsel for the defendant to file this stipulation and proposed order.

15
16 IT IS SO STIPULATED.

17 DATED: August 4, 2025

/s/
EMILY R. DAHLKE
Assistant United States Attorney

18
19 DATED: August 4, 2025

/s/
ELISSE LA ROUCHE
Counsel for Defendant JAMIE NUNEZ
HERNANDEZ

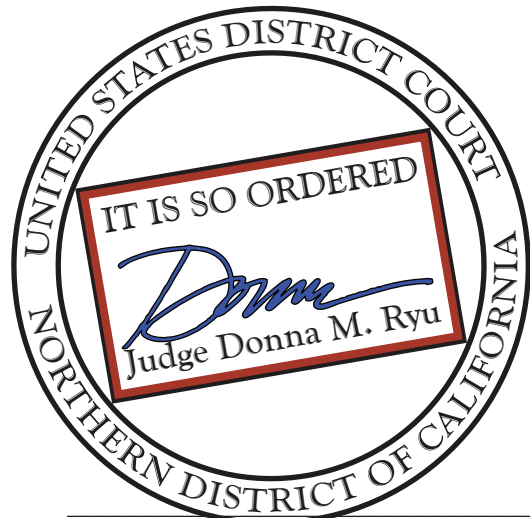
ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that it is appropriate to continue the status conference from August 8, 2025 to August 26, 2025. Further, the Court finds that failing to exclude the time from August 8, 2025 through August 26, 2025, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from August 8, 2025, through August 26, 2025, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the status conference be continued to August 26, 2025, and that the time from August 8, 2025 through August 26, 2025, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The Court also finds good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and for extending the 30-day time period for an indictment under the Speedy Trial Act (based on the exclusions set forth above). *See* Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b) to August 26, 2025.

IT IS SO ORDERED.

DATED: August 4, 2025



DONNA M. RYU
Chief Magistrate Judge